

1 William B. Abrams
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6 *Pro Se Claimant and*

7 *Party to California Public Utilities Commission Proceeding I.15-08-019 to Determine whether*
8 *Pacific Gas and Electric Company and PG&E's Corporation's Organizational Culture and*
9 *Governance Prioritizes Safety*

10 *Party to California Public Utilities Commission Proceeding A.20-06-011 which is the Application of*
11 *Pacific Gas and Electric Company for Approval of Regionalization Proposal*

12 *Party to California Public Utilities Commission Proceeding R.18-10-007 which is the Order*
13 *Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate*
14 *Bill 901*

15 **UNITED STATES BANKRUPTCY COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 In re:

19 PG&E CORPORATION,

20 -and-

21 PACIFIC GAS AND ELECTRIC
22 COMPANY,

23 Debtors.

- 24 ☐ Affects PG&E Corporation
25 ☐ Affects Pacific Gas and Electric Company
26 ☒ Affects both Debtors

27 * *All papers shall be filed in the lead case,*
28 *No. 19-30088 (DM)*

Bankr. Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administrated)

**DECLARATION OF WILLIAM B.
ABRAMS IN SUPPORT OF
WILLIAM B. ABRAMS MOTION TO
ENFORCE THE VICTIM TRUST
AGREEMENT AND REPLACE ALL
MEMBERS OF THE FIRE VICTIM
TRUST OVERSIGHT COMMITTEE
AND TO SUPPORT EFFICIENT
TRUST ADMINISTRATION
PURSUANT TO U.S.C. §§ 1123(A)(4)
AND FIRE VICTIM TRUST
AGREEMENT SECTION 6.2**

Related Documents: Dkt. 10748

1 I, William B. Abrams, pursuant to section 1746 of title 28 of the United States Code,
2 hereby declare under penalty of perjury that the following is true and correct to the best of my
3 knowledge, information, and belief:

4 1. I am a claimant and a PG&E Fire Survivor who has engaged in this proceeding as a
5 Pro Se party to promote and collaborate with core parties in good-faith towards a plan, Trust
6 Agreement and Trust oversight that provides just settlements for all claimants and provides adequate
7 restructuring for Pacific Gas and Electric Corporation so our communities are safer and more secure.

8 2. I submit this declaration in support of this Motion (the “**Motion for Trust**
9 **Oversight**”), pursuant to Rule 9006-1 of the Bankruptcy Local Rules for United States District Court
10 for the Northern District of California (the “Bankruptcy Local Rules”), for entry of an order and for a
11 hearing on Friday, July 13, 2021 at 10:00 a.m. (prevailing Pacific Time), on the “*WILLIAM B.*
12 *ABRAMS MOTION TO ENFORCE THE VICTIM TRUST AGREEMENT AND REPLACE ALL*
13 *MEMBERS OF THE FIRE VICTIM TRUST OVERSIGHT COMMITTEE AND TO SUPPORT*
14 *EFFICIENT TRUST ADMINISTRATION PURSUANT TO U.S.C. §§ 1123(A)(4) AND FIRE VICTIM*
15 *TRUST AGREEMENT SECTION 6.2*” (“**Motion for Trust Oversight**”), filed on June 6, 2021.¹

16 William B. Abrams requests that any responses or objections to the Motion for Trust Oversight be in
17 writing and filed with the Court and served by 4:00 p.m. (prevailing Pacific Time) on July 2, 2021.

18 3. I believe that approval of the Motion for Trust Oversight as described therein is
19 particularly critical to restore trust in the Victim Trust oversight. To whatever extent there is
20 uncertainty and disputes regarding the violations described in the Motion for Trust Oversight, these
21 differences need to be resolved quickly to ensure the proper oversight regarding the processes to fully
22 fund the trust to the \$13.5B amount and to justly and timely process Fire Victim Claims.

23 4. I believe that prompt resolutions of these violations are in the best interest of all
24 parties and in particular the victim claimants who are a priority for this court. I believe that the
25 timeframe stipulated in the Motion for Trust Oversight provides adequate time for all parties to file
26 objections and to have substantive oral arguments on July 13, 2021.

27 ¹ Capitalized terms used but not defined herein have the meanings ascribed to them in the Motion to Designate
28 Votes or the Motion to Shorten, as applicable.

1 I declare under penalty of perjury that, to the best of my knowledge and after reasonable
2 inquiry, the foregoing is true and correct and that this declaration was executed at Santa Rosa,
3 California on June 7, 2021.

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6 William B. Abrams
7 Pro Se Claimant
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